



March 16, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

Ex Parte Filing Re: Notice of Proposed Rulemaking (WT Docket 10-153)

Dear Ms. Dortch:

The New America Foundation's Open Technology Initiative (NAF) is writing in support of the Commission's Notice of Proposed Rulemaking (NPRM) to allow the authorization of “auxiliary stations” for Fixed Services (FS) licensees. The Open Technology Initiative promotes affordable, universal, and ubiquitous communications networks through partnerships with communities, researchers, industry, and public interest groups.

Having reviewed the record of the proceeding, we believe the proposal to allow Fixed Service (“FS”) licensees to operate “auxiliary stations” in conjunction with existing wireless links will promote greater use of spectrum that would otherwise lay fallow. We urge the Commission to support innovation and approve the use of “auxiliary stations” under the proposed framework provided in the NPRM, and with appropriate safeguards to ensure current and future licensees continue to utilize the “minimum amount of power necessary to carry out the communication desired” as provided in §101.113(a).¹ Although we expect the additional equipment costs associated with transmitting at a higher EIRP will serve as a strong disincentive for licensees to specify excessive power levels in an effort to create a larger service area for “auxiliary stations,” we also urge the Commission to rigorously enforce §101.113(a) and §101.103(d)(1) for license applications.

Given the increasing demand for spectrum resources, we believe it is paramount for the FCC to encourage the development and deployment of technologies that make more efficient use of spectrum. Congestion in many radio frequency bands has been an increasing problem, thus necessitating the Commission to consider technologies and policies that will permit existing and future licensees to maximize their utilization of spectrum. We also expect that “auxiliary stations” will create opportunities for increasing availability and lowering costs for wireless backhaul links to promote greater access and competition in wireless broadband.

¹ 47 C.F.R. § 101.113(a)

Respectfully submitted,

_____/s/_____
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